UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
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November 9, 2015

Mr. Kurt Readus
State Conservationist
Natural Resources Conservation Service
U.S. Department of Agriculture
100 W. Capitol Street, Suite 1321
Jackson, Mississippi 39269

Subject: FINAL SUPPLEMENTAL ENVIRONMENTAL IMPACT STATEMENT (FSEIS) for the LONG BEACH WATERSHED; Harrison County, MS; CEQ Number: 20150049

Dear Mr. Readus:

The U. S. Environmental Protection Agency (EPA) has reviewed the above referenced Final Supplemental Environmental Impact Statement (FSEIS) for the Long Beach Watershed in accordance with its responsibilities under Section 309 of the Clean Air Act and Section 102(2)(C) of the National Environmental Policy Act (NEPA). The project sponsors and the U.S. Department of Agriculture, Natural Resources Conservation Service (NRCS) are updating the original environmental impact statement (1989) in order to identify the impacts associated with modifying Canal No. 1, located in Harrison County, Mississippi, to reduce flooding to urban areas along the canal. The FSEIS also includes the Supplemental Watershed Agreement No. 2.

The FSEIS examines two alternatives – Alternative No. 1 ("No Action") and Alternative No. 2 (channel improvements). Alternative No. 2, which consists of proposed improvements to Canal No. 1 is identified in the FSEIS as the preferred alternative. Alternative No. 2 involves improvements to 4.7 miles of Canal No. 1 between the Naval Construction Battalion Center and Espy Avenue, including 3.8 miles of widening, side-sloping and grading of the earth-lined channel, 0.2 miles of rock riprap lined channel, and 0.7 miles of selective snagging.

Based on the EPA's review of the FSEIS, the NRCS adequately responded to all of the EPA's comments on the Draft Supplemental Environmental Impact Statement (DSEIS).

According to the FSEIS, the proposed project will decrease the average width of the floodplain, and decrease the elevation, top-width, and velocity of floodwaters. The channel improvements will benefit 121 structures located along the 500-year floodplain along Canal No. 1. Two (2) properties located downstream from the channel improvements will experience increased

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flooding from increased storm elevations downstream. The EPA notes that flood proofing and other types of damage mitigation will be provided as mitigation for the two properties located downstream. With regards to the EPA's concern that decreasing the size of the floodplain will result in encroachment of development and exacerbate existing flooding issues, the EPA acknowledges the suggestion incorporated in the FSEIS that the reduced floodplain be preserved as undeveloped area in order to reduce potential runoff, and the additional statement that the existing floodplain regulations should be strictly enforced to minimize encroachment and reduce the runoff potential.

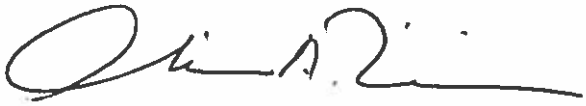
The EPA appreciates the analysis of the impacts of the proposed project to the drainage conditions within the Turkey Creek basin. According to the FSEIS, while the vast majority of any overflow from Turkey Creek is transported downstream by Canal No. 2-3, some of the Turkey Creek floodwater breaks over the watershed boundary along 28th Street and flows into the Long Beach Watershed. According to the FESIS, the improved channel is located far enough downstream that there is no change in the backwater effect from Canal No. 1 at the area that the Turkey Creek overflow occurs at 28th Street. The channel improvements are not expected to have any effect on the overflow from Turkey Creek to the Long Beach Watershed for any given storm nor any effect on flow down the Turkey Creek Watershed for any given storm.

According to the FSEIS, the U.S. Army Corps of Engineers (USACE), a cooperating agency in the development of the FSEIS, will use the SEIS as the NEPA document on which to base a decision regarding the issuance of a Clean Water Act Section 404 or Rivers and Harbors Act Section 10 permit. The FSEIS indicates there are only 0.01 acres of permanent impacts to jurisdictional wetlands and waters of the United States. The centerline of some sections of the channel will be realigned in order to avoid impacts to some delineated wetlands. The EPA will coordinate with the USACE through the CWA Section 404 permitting process as the project moves forward. This coordination may include further evaluation of avoidance, minimization, and mitigation opportunities.

The proposed project will involve the clearing of 61 acres of riparian area. The FSEIS identifies minimization measures to control sediment and compensatory activities for impacts to fish and wildlife habitat. The 61 acres of land temporarily cleared in the channel right-of-way will be reforested and an additional 58 acres of tree plantings will be accomplished on suitable cleared land within the watershed. EPA notes that the NRCS agrees to minimize clearing of the riparian area as much as possible, and will make all efforts to minimize temporal losses. As the proposed project moves forward in the NEPA process, the EPA asks that the NRCS consider the 2014 Revised Draft Council on Environmental Quality Guidance on Greenhouse Gas Emissions and Climate Change in your Record of Decision (ROD) and discern its applicability to the proposed project. The NRCS may wish to consider the potential effects of climate change and the risk of increased severe storm events and the potential risk of increased flooding. Please see: https://www.whitehouse.gov/sites/default/files/docs/nepa_revised_draft_ghg_guidance_searchable.pdf.

Thank you for the opportunity to comment on the FSEIS. Please provide the EPA with a copy of the ROD when it becomes available. If you have any questions, please feel free to contact Mr. Kenneth Dean of my staff at (404) 562-9378 or by email at dean.william-kenneth@epa.gov .

Sincerely,



Christopher A. Militscher
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